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May 1, 2023

BY ECF

The Honorable Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

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Re: Motion for Extension of Time to File Third-Party  
Petition in *United States v. Tim Leissner*,  
No. 1:18-cr-00439-MKB

Dear Chief Judge Brodie:

We write on behalf of our client Ken Siazon, to respectfully request a brief extension of time to file a third party claim in the forfeiture proceedings in the above-referenced case, from May 8, 2023 to May 22, 2023.<sup>1</sup> The additional time is needed in the interests of justice to allow undersigned counsel, who was retained in the past week, to have additional time to prepare Mr. Siazon's claim. Undersigned counsel has conferred with AUSA Drew Rolle, who has no objection to the proposed 14-day extension of time.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Gina Parlovecchio

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<sup>1</sup> Pursuant to 21 U.S.C. § 853(n)(2), Mr. Siazon's third party claim is presently due on Saturday, May 6, 2023. Given that this deadline falls on a weekend, the claim is therefore currently due on Monday, May 8, 2023. See Fed. R. Civ. P. 6(a)(1)(C); see also *Pacheco v. Serendensky*, 393 F.3d 348, 352 (2d Cir. 2004) (explaining that the rules of civil procedures, e.g., Rule 12(b)(6), apply to third-party petitions to modify criminal forfeiture orders).